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Read & <u>Understand</u> Your Air Permit Module

Commonwealth of Kentucky Energy and Environment Cabinet Department for Environmental Protection Division for Air Quality 200 Fair Oaks Lane, 1st Floor Frankfort, Kentucky 40601 (502) 564-3999

Final

AIR QUALITY PERMIT Issued under 401 KAR 52:030

Permittee Name: Mailing Address:

Source Name: Mailing Address:

Source Location:

Permit ID:

Agency Interest #:

Activity ID: Review Type:

Source ID: 21-000-00000

Regional Office: Florence Regional Office

F.

8020 Veterans Memorial Drive, Suite 110

Florence, KY 41042

(859) 525-4923

County: Boone

Application

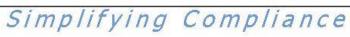
Complete Date: April 9, 2009 Issuance Date: August 31, 2009

Revision Date: N/A

Expiration Date: August 31, 2014

John S. Lyons, Director Division for Air Quality







Permit Layout		
Section A	Permit Authorization	
Section B	Regulations and requirements for individual or groups of similarly regulated emission points or units	
Section C	Insignificant Activities	
Section D	Facility-wide limitations and testing requirements	
Section E	Special Control Equipment Provisions	
Section F	Monitoring, Recordkeeping, Reporting General Provisions	
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SECTION A - PERMIT AUTHORIZATION

Pursuant to a duly submitted application the Kentucky Division for Air Quality (Division) hereby authorizes the operation of the equipment described herein in accordance with the terms and conditions of this permit. This permit has been issued under the provisions of Kentucky Revised Statutes Chapter 224 and regulations promulgated pursuant thereto.

The permittee shall not construct, reconstruct, or modify any affected facilities without first submitting a complete application and receiving a permit for the planned activity from the permitting authority, except as provided in this permit or in 401 KAR 52:030, Federally-enforceable permits for non-major sources.

Issuance of this permit does not relieve the permittee from the responsibility of obtaining any other permits, licenses, or approvals required by this Kentucky Energy and Environment Cabinet (Cabinet) or any other federal, state, or local agency.







SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS

Emission Point 1 Two Spray Booths (Booth # 1 and #2)

Description

Spray Operation System: Air Less Spray Gun

The maximum capacity of the spray gun: 3.43 gallons per hour each

Year of installation of spray guns: 1998
The transfer efficiency of the system: 45%
Control Equipment: Filters
Estimated control Efficiency: 90%

Emission Point 2 Spray Booth (Booth # 3)

Description

Spray Operation System: Air Less Spray Gun

The maximum capacity of the spray gun: 3.43 gallons per hour

Year of installation of spray guns: 1998
The transfer efficiency of the system: 45%
Control Equipment: Filters

Estimated control Efficiency: 90%







APPLICABLE REGULATIONS:

401 KAR 59:010, New Process Operations, is applicable to each affected facility associated with a process operation commenced on or after July 2, 1975.

401 KAR 52:030. Federally-enforceable permits for nonmajor sources.

STATE-ORIGIN REQUIREMENTS:

401 KAR 63:020, Potentially hazardous matter or toxic substances, is applicable to each affected facility which emits or may potentially emit hazardous matter or toxic substances.









SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS

- 1. Operating Limitations
- 2. Emission Limitations
- 3. Testing Requirements
- 4. Specific Monitoring Requirements
- 5. Specific Recordkeeping Requirements
- 6. Specific Reporting Requirements
- 7. Specific Control Equipment Operating Conditions



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SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS

1. Operating Limitations:

The filters shall be in place and operational according to the manufacturer's specifications and recommendations at anytime a given spray booth is in use.

1. Operating Limitations:

None

1. Operating Limitations:

The usage rate of materials used in all affected facilities shall be limited so as not to exceed the emission limitations listed in Section B (2) below.



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SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS

2. Emission Limitations:

a. Standard for Opacity [401 KAR 59:010 Section (3)]:

The permittee shall not cause, suffer, allow, or permit any continuous emission into the open air from a control device or stack associated with any affected facility (s) which is equal to or greater than twenty (20) percent opacity.

Compliance Demonstration Method:

Compliance with the opacity standard shall be determined by the permittee performing a qualitative visual observation of the opacity of emissions at each stack no less than weekly and maintaining a log of the observations. If visible emissions from the stacks are seen (not including condensed water in the plume), then an inspection of control equipment shall be initiated and corrective action taken. If visible emissions are present after the corrective action, the process shall be shut down and shall not operate again until repairs have been made that result in no visible emissions from the process during operation. In lieu of shutting the process down, the permittee may determine the opacity using Reference Method 9. If the opacity limit is not exceeded, the process may continue to operate.





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SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS

2. Emission Limitations:

b. Standard for Particulate Matter [401 KAR 59:010 Section 3(2)]:

For emission from a control device or stack, no person shall cause, suffer, allow or permit the emission in to the open air of particulate matter (PM) from any affected facility which is in excess of 2.34 lb/hr.

Compliance Demonstration Method:

The filter system is to be maintained and operated in accordance with the manufacturer's instruction, and is to be operated at all times that spray machines/booths are in use. When the affected facility is operated in accordance with manufacturer's recommendations, the source is considered to be in compliance with the mass limit.



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2. Emission Limitations:

c. Annual HAPS Limitations (401 KAR 52:030):

The source has accepted a facility-wide cap on annual emissions of individual Hazardous Air Pollutant (HAP) emissions of no more than five (5) tons for each individual HAP per rolling twelve (12) month period, and the source has accepted a facility-wide cap on annual emissions for all combined HAPs of no more than twelve and one-half (12.5) tons per rolling twelve (12) month period. The actual HAP/HAPs emissions shall be calculated based on a twelve (12) month rolling total.

Compliance Demonstration Method:

The following equations may be used to calculate the HAP emissions:

Monthly HAP emissions = ∑ [Monthly usage of coatings or any other HAP containing material in pounds or gallons per month] x [HAP fraction] x [appropriate conversion factor (if usage is in gallons) for gallons to pounds for coating or any other HAP containing material used].

Monthly Combined HAPs emissions = Sum of all individual HAP emissions

Rolling twelve (12) month total HAP emissions = Sum of monthly HAP emissions and
the eleven (11) previous monthly HAP totals.







2. Emission Limitations:

D. Annual HAP Limitations (401 KAR 52:030):

The permittee shall keep source wide combined HAP emissions no greater than 22.5 tons and single HAP emissions no greater than 9 tons per rolling 12-month period, with ethyl benzene actual emissions limited to 2 tons per year.

Compliance Demonstration Method:

See Section D(2).

Ethylbenzene



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SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS

3. <u>Testing Requirements</u>:

Testing shall be conducted at such times as may be required by the Cabinet in accordance with the Regulations 401 KAR 59:005, Section 2(2) and KAR 50:045, Section 3.

3. <u>Testing Requirements</u>:

- a) See Monitoring Requirement (b) below.
- b) Additionally, testing shall be conducted at such times as may be required by the Cabinet in accordance with 401 KAR 59:005, Section 2(2), and 401 KAR 50:045, Section 4.
 - i) If the Cabinet requires testing for PM, the permittee shall determine compliance with the PM emission limitation using U.S. EPA Reference Method 5 as specified in 401 KAR 59:015, Section 8.
 - ii) If the Cabinet requires testing for SO₂, the permittee shall determine compliance with the SO₂ emission limitation using U.S. EPA Reference Method 6 as specified in 401 KAR 59:015, Section 8.



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SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS

4. **Specific Monitoring Requirements:**

See the Compliance Demonstration Methods in Section B (2).

4. Monitoring Requirements:

- a) The permittee shall monitor usage of wood (in tons) in the boiler on a monthly basis [401 KAR 52:040, Section 10].
- b) The permittee shall perform a qualitative visual observation of the opacity of emissions from the stack at an interval not to exceed seven (7) operating days and maintain a log of the observations. If visible emissions (not including condensed water in the plume) from the stack are seen, then an inspection shall be initiated and corrective action taken. If visible emissions are present after the corrective action, the boiler shall be shut down and shall not be operated again until repairs have been made such that operation results in no visible emissions from the boiler. In lieu of shutting the boiler down, the permittee may determine the opacity using Reference Method 9. If the opacity limit does not exceed twenty (20) percent, the boiler may continue to operate. [401 KAR 52:040, Section 10]







SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS

5. Specific Recordkeeping Requirements:

- a. The permittee shall maintain a log of the visual opacity observations, records of corrective actions taken as a result of visible emissions from a stack and records of any Reference Method 9 readings performed.
- b. The permittee shall maintain a log of the pressure drop readings across the filters, including the date, and dates of filter replacements. For any booth that is not in operation on a given date, this fact should also be noted.
- c. Monthly records shall be kept of all materials used containing VOC and HAP, including the product type, amount used and the weight percentages VOC and all individual HAPs.
- d. At the end of each month, VOC and HAP emissions shall be calculated per Section D of this permit, and every month, a new 12-month rolling total for VOC and HAP emissions shall be calculated.
- e. At the end of each month, Naphthalene and Cobalt emissions shall be calculated, and every month, a new 12-month rolling total emissions shall be calculated.



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SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS

6. Specific Reporting Requirements:

- a. The permittee shall submit a copy of the control device inspection and repair log for those times when corrective actions are required due to an opacity exceedance and/or records of any Reference Method 9 opacity observations as noted in Section B (4) a. Copies of these records shall be submitted as a part of the semiannual reporting as required in Section F (5) & (6).
- b. The permittee shall report the number of gallons of each coating applied, the amount of VOC's and HAP's contained in the coatings, and the source wide monthly and twelve (12) month rolling total VOC and HAPs emissions as part of the semiannual reporting as required in Section F (5) & (6).
- c. The permittee shall report the dates for start of construction, equipment startup, and the date when the maximum operating rate is achieved in accordance with Section G 4.b. of this permit.



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SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS

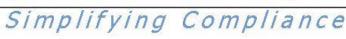
7. Specific Control Equipment Operating Conditions:

Filters shall be cleaned / replaced as per manufacturer's recommendations to ensure good air pollution control practices.

7. Control Equipment Operating Conditions:

- a) The centrifugal collector shall be operated to maintain compliance with permitted emission limitations, in accordance with manufacturer's specifications and standard operating practices [401 KAR 50:055, Section 2].
- b) Records regarding the maintenance of the control equipment shall be maintained [401 KAR 52:040, Section 10].
- c) See Subsection C.6 for general control equipment operating conditions.







SECTION C - INSIGNIFICANT ACTIVITIES

The following listed activities have been determined to be insignificant activities for this source pursuant to 401 KAR 52:030, Section 6. Although these activities are designated as insignificant the permittee must comply with the applicable regulation. Process and emission control equipment at each insignificant activity subject to an opacity standard shall be inspected monthly and a qualitative visible emissions evaluation made. Results of the inspection, evaluation, and any corrective action shall be recorded in a log.

	<u>Description</u>	Generally Applicable Regulation
1.	Solvent – Gun Cleaning	401 KAR 63:020
2.	Gas Metal Arc Welding (GMAW) – 37 machines	401 KAR 59:010; 401 KAR 63:020
3.	One Laser Metal Cutter Controlled by a dust extractor suction system	401 KAR 59:010; 401 KAR 63:020
4.	One Abrasive Blast System (steel grit) Controlled by a dust collector	401 KAR 59:010; 401 KAR 63:020





SECTION D - SOURCE EMISSION LIMITATIONS AND TESTING REQUIREMENTS

SECTION E - SOURCE CONTROL EQUIPMENT REQUIREMENTS

Pursuant to 401 KAR 50:055, Section 2(5), at all times, including periods of startup, shutdown and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Division which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.





SECTION F - MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS

- Pursuant to Section 1b-IV-1 of the Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources incorporated by reference in 401 KAR 52:030 Section 26, when continuing compliance is demonstrated by periodic testing or instrumental monitoring, the permittee shall compile records of required monitoring information that include:
 - Date, place (as defined in this permit), and time of sampling or measurements;
 - Analyses performance dates;
 - Company or entity that performed analyses;
 - Analytical techniques or methods used;
 - Analyses results; and
 - Operating conditions during time of sampling or measurement.
- 2. Records of all required monitoring data and support information, including calibrations, maintenance records, and original strip chart recordings, and copies of all reports required by the Division for Air Quality, shall be retained by the permittee for a period of five (5) years and shall be made available for inspection upon request by any duly authorized representative of the Division for Air Quality [401 KAR 52:030, Section 3(1)(f)1a, and Section 1a-7 of the Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources incorporated by reference in 401 KAR 52:030, Section 26].





SECTION F - MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS

- 3. In accordance with the requirements of 401 KAR 52:030, Section 3(1)f, the permittee shall allow authorized representatives of the Cabinet to perform the following during reasonable times:
 - a. Enter upon the premises to inspect any facility, equipment (including air pollution control equipment), practice, or operation;
 - b. To access and copy any records required by the permit;
 - Sample or monitor, at reasonable times, substances or parameters to assure compliance with the permit or any applicable requirements.

Reasonable times are defined as during all hours of operation, during normal office hours; or during an emergency.

4. No person shall obstruct, hamper, or interfere with any Cabinet employee or authorized representative while in the process of carrying out official duties. Refusal of entry or access may constitute grounds for permit revocation and assessment of civil penalties.





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What to Expect From a DEP Inspection

Posted on December 4, 2012

If you're a facility regulated by the department, then at some point, you will receive a visit from one of our air, water or waste inspectors. This can be a nerve-racking experience for many; but there are things you can do to prepare and feel comfortable when visited by one of our inspectors.







SECTION F - MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS

- 5. Summary reports of any monitoring required by this permit shall be submitted to the Regional Office listed on the front of this permit at least every six (6) months during the life of this permit, unless otherwise stated in this permit. For emission units that were still under construction or which had not commenced operation at the end of the 6-month period covered by the report and are subject to monitoring requirements in this permit, the report shall indicate that no monitoring was performed during the previous six months because the emission unit was not in operation [Sections 1b-V-1 of the *Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources* incorporated by reference in 401 KAR 52:030, Section 26].
 - 6. The semi-annual reports are due by January 30th and July 30th of each year. All reports shall be certified by a responsible official pursuant to 401 KAR 52:030, Section 22. If continuous emission and opacity monitors are required by regulation or this permit, data shall be reported in accordance with the requirements of 401 KAR 59:005, General Provisions, Section 3(3). All deviations from permit requirements shall be clearly identified in the reports.







SECTION F - MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS

- 7. In accordance with the provisions of 401 KAR 50:055, Section 1, the owner or operator shall notify the Regional Office listed on the front of this permit concerning startups, shutdowns, or malfunctions as follows:
 - a. When emissions during any planned shutdowns and ensuing startups will exceed the standards, notification shall be made no later than three (3) days before the planned shutdown, or immediately following the decision to shut down, if the shutdown is due to events which could not have been foreseen three (3) days before the shutdown.
 - b. When emissions due to malfunctions, unplanned shutdowns and ensuing startups are or may be in excess of the standards, notification shall be made as promptly as possible by telephone (or other electronic media) and shall be submitted in writing upon request.
- 8. The owner or operator shall report emission related exceedances from permit requirements including those attributed to upset conditions (other than emission exceedances covered by Section F.7 above) to the Regional Office listed on the front of this permit within 30 days. Deviations from permit requirements, including those previously reported under F.7 above, shall be included in the semiannual report required by F.6 [Sections 1b-V, 3 and 4 of the Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources incorporated by reference in 401 KAR 52:030, Section 26].



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SECTION F - MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS

- 9. Pursuant to 401 KAR 52:030, Section 21, the permittee shall annually certify compliance with the terms and conditions contained in this permit by completing and returning a Compliance Certification Form (DEP 7007CC) (or an alternative approved by the regional office) to the Regional Office listed on the front of this permit in accordance with the following requirements:
 - a. Identification of each term or condition;
 - b. Compliance status of each term or condition of the permit;
 - c. Whether compliance was continuous or intermittent;
 - d. The method used for determining the compliance status for the source, currently and over the reporting period.
 - e. For an emissions unit that was still under construction or which has not commenced operation at the end of the 12-month period covered by the annual compliance certification, the permittee shall indicate that the unit is under construction and that compliance with any applicable requirements will be demonstrated within the timeframes specified in the permit.
 - f. The certification shall be postmarked by <u>January 30th</u> of each year. Annual compliance certifications shall be mailed to the Division for Air Quality, Hazard Regional Office, 233 Birch Street, Suite 2, Hazard, KY 41701.



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SECTION G - GENERAL PROVISIONS



2. Permit Expiration and Reapplication Requirements

- a. This permit shall remain in effect for a fixed term of five (5) years following the original date of issue. Permit expiration shall terminate the source's right to operate unless a timely and complete renewal application has been submitted to the Division at least six (6) months prior to the expiration date of the permit. Upon a timely and complete submittal, the authorization to operate within the terms and conditions of this permit, including any permit shield, shall remain in effect beyond the expiration date, until the renewal permit is issued or denied by the Division [401 KAR 52:030, Section 12].
- b. The authority to operate granted through this permit shall cease to apply if the source fails to submit additional information requested by the Division after the completeness determination has been made on any application, by whatever deadline the Division sets [401 KAR 52:030, Section 8(2)].







SECTION H - ALTERNATE OPERATING SCENARIOS

None

SECTION I - COMPLIANCE SCHEDULE

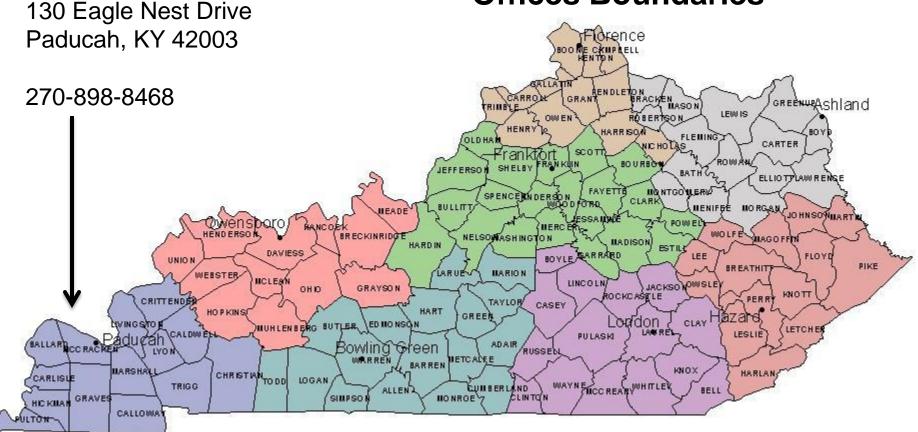
None



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Paducah Region Office





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Owensboro Region Office

Division for Air Quality Regional Offices Boundaries 3032 Alvey Park Dr. W.



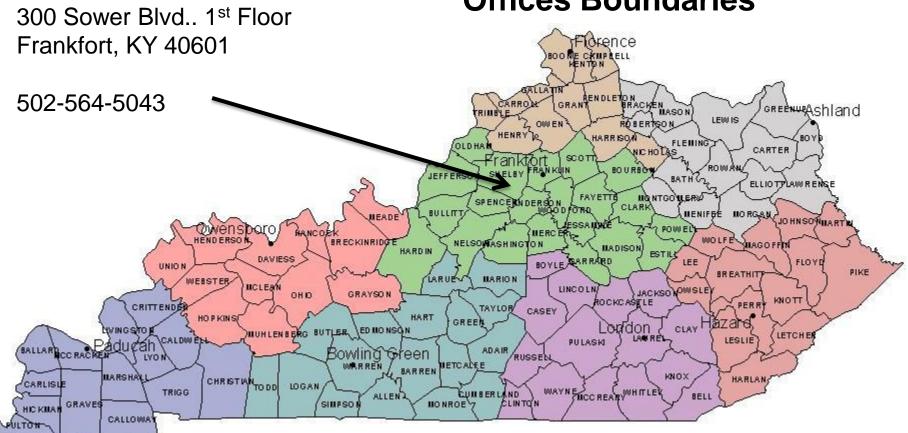


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Frankfort Region Office

Division for Air Quality Regional Offices Boundaries



NOTE: Jefferson County is regulated by the Louisville Metro Air Pollution Control District



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Florence Region Office

TRIGG

GRAVES

CALLOWA

HIC KMAN

Division for Air Quality Regional Offices Boundaries



MONROE

CLINTO'N

SIMPSOR



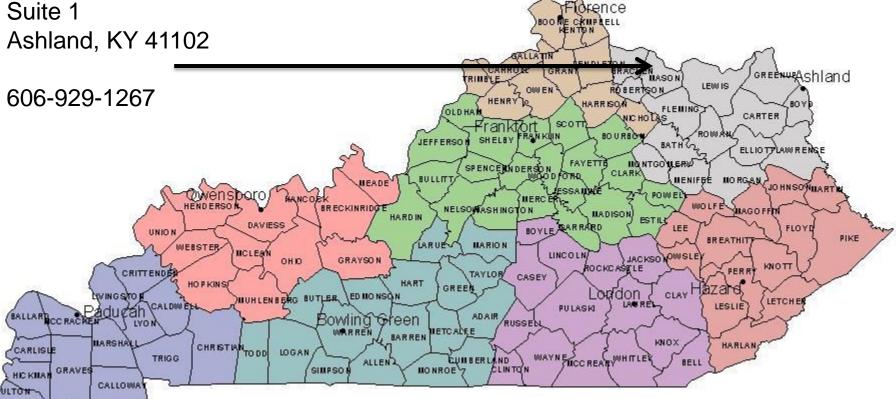
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Ashland Region Office

Division for Air Quality Regional Offices Boundaries

1550 Wolohan Drive Suite 1

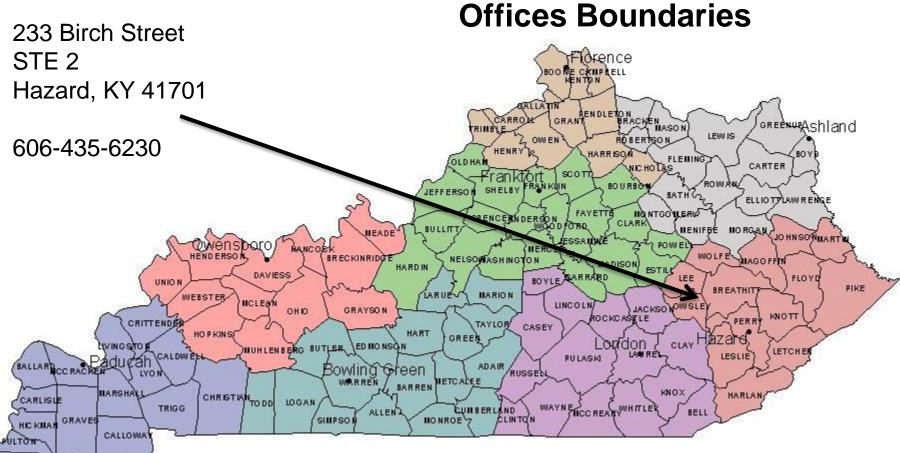




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Hazard Region Office

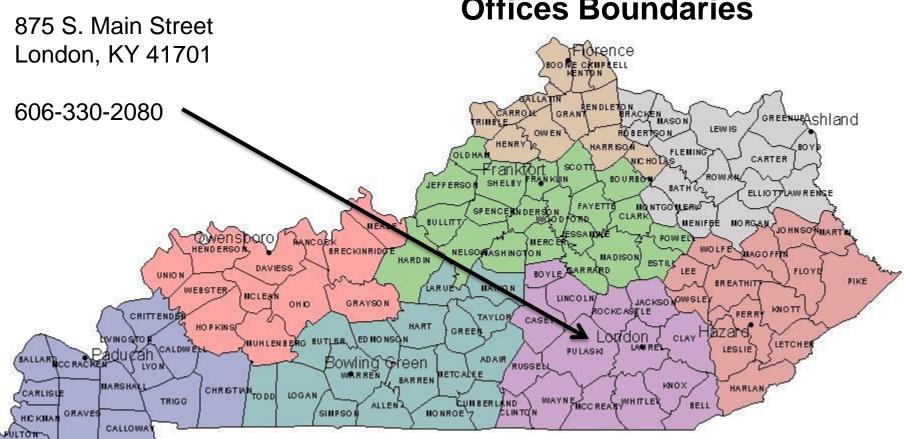




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London Region Office

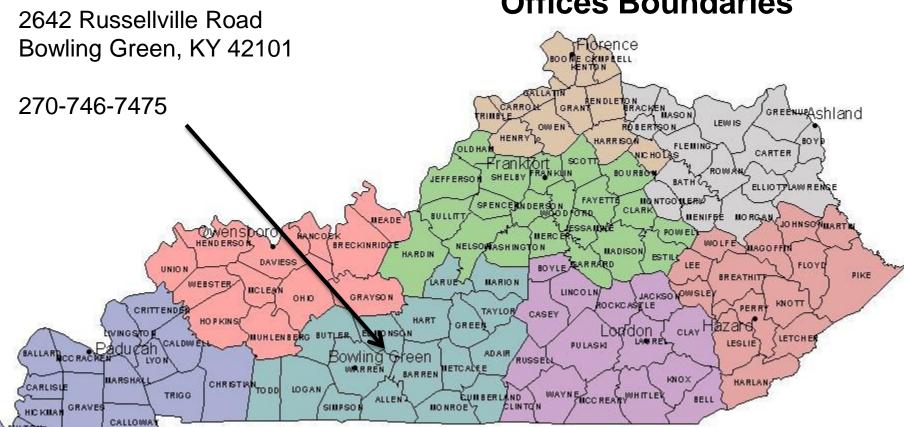




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Bowling Green Region Office











- envhelp@ky.gov
- 502-782-6189
- 300 Sower Blvd., 1st Floor Frankfort, KY 40601



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